

1 Mark C. Dangerfield, #010832
Mark.dangerfield@gknet.com
2 Dale C. Schian, #010445
dale.schian@gknet.com
3 Kenneth N. Ralston, #034022
ken.ralston@gknet.com
4 GALLAGHER & KENNEDY, P.A.
2575 East Camelback Road
5 Phoenix, Arizona 85016-9225
Telephone: (602) 530-8000
6 Facsimile: (602) 530-8500
Attorneys for Trustee Timothy H. Shaffer
7 Email: bkdocket@gknet.com

8
9 **IN THE UNITED STATES BANKRUPTCY COURT**
10 **FOR THE DISTRICT OF ARIZONA**

11 In re:
12 POTENTIAL DYNAMIX, LLC,
13 Debtor.

Case No. 2:11-BK-28944-DPC

Chapter 11

Adv. No. 2-13-ap-00799

**MOTION TO APPROVE THE
TRUSTEE'S CONTINUED
ENGAGEMENT OF RESOLUTION
STRATEGIES, LLP**

16 TIMOTHY H. SHAFFER, Chapter 11
17 Trustee,

18 Plaintiff,

19 v.

20 AMAZON SERVICES, LLC,

21 Defendant.
22

23 Timothy H. Shaffer, the duly appointed Chapter 11 Trustee ("Trustee") for Potential
24 Dynamix, LLC (the "Debtor") in the above-captioned bankruptcy case (the "Case"),
25 requests the Court approve the Trustee's continued engagement of Resolution Strategies,
26 L.L.P. (the "Firm") as settlement counsel on the Case. Pursuant to 11 U.S.C. § 327(E) and

1 the Court's Order [DE 534], the Trustee employed the Firm to assist as settlement counsel.
2 The Firm has been engaged on the Case for three years. Per the Firm's employment
3 application approved by the Court [DE 532], the Firm's employment was to terminate sixty
4 days before trial.

5 The Trustee requests a continuation of the Firm's engagement on the Case as there
6 remains a need for the Firm's services as settlement counsel. The Firm will not impede the
7 Case and remains a disinterested party. Additionally, the Trustee's continued engagement
8 of the Firm will be in the best interest of the estate.

9 RESPECTFULLY SUBMITTED February 9, 2021.

10 **GALLAGHER & KENNEDY, P.A.**

11
12 By: /s/Dale C. Schian

13 Mark C. Dangerfield

14 Dale C. Schian

15 Kenneth N. Ralston

16 2575 East Camelback Road

17 Phoenix, Arizona 85004

18 *Attorneys for Trustee Timothy H. Shaffer*

1 COPY of the foregoing
2 e-mailed February 9, 2021, to:

3 Eric J. Weiss (*Admitted Pro Hac Vice*)
4 Mallory Gitt Webster (*Admitted Pro Hac Vice*)
5 Perkins Coie, LLP
6 1201 Third Avenue, #4900
7 Seattle, Washington 98101-3099
8 Attorneys for Amazon Services LLC
9 EWeiss@perkinscoie.com
10 MWebster@perkinscoie.com

11 Richard M. Lorenzen, Esq.
12 Perkins Coie, LLP
13 2901 North Central Avenue, #2000
14 Phoenix, Arizona 85012-2788
15 Attorneys for Amazon Services LLC
16 rlorenzen@perkinscoie.com

17 Elizabeth C. Amorosi
18 Richard J. Cuellar
19 Jennifer A. Giaimo
20 Office of the U.S. Trustee
21 230 N. 1st Ave., Suite 204
22 Phoenix, Arizona, 85003
23 Attorneys for U.S. Trustee
24 Jennifer.a.giaimo@usdoj.gov

25 Thomas H. Allen
26 Michael A. Jones
Allen Barnes & Jones, PLC
1850 N. Central Ave., Suite 1150
Phoenix, Arizona 85004
Attorneys for Official Committee of Unsecured Creditors
tallen@allenbarnes.law.com
mjones@allenbarneslaw.com

/s/J. Magallanes
8413143v4/29611-0001